FILED

OCT - 4 2018

Clerk, U.S District Court
District Of Montana
Great Falls

CYNDEE L. PETERSON
Assistant U.S. Attorney
U.S. Attorney's Office
P.O. Box 8329
Missoula, MT 59807
105 E. Pine
Missoula, MT 59802
Phone: (406) 542-8851
FAX: (406) 542-1476
Email: Cyndee.Peterson@usdoj.gov

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. JAMIE BROCK GRUBB, Defendant.	CR 18-23-BU-DLC INDICTMENT SEXUAL EXPLOITATION OF A CHILD (Count I) Title 18 U.S.C. § 2251(a) (Penalty: Mandatory minimum 25 to 50 years imprisonment, $250,000 fine, five years to lifetime supervised release, and $5,000 special assessment) DISTRIBUTION OF CHILD PORNOGRAPHY (Counts II-VIII) Title 18 U.S.C. § 2252(a)(2) (Penalty: Mandatory minimum 15 to 40 years imprisonment, $250,000 fine, five years to lifetime supervised release, and $5,000 special assessment)

	TRANSPORTATION OF CHILD PORNOGRAPHY (Count IX) **Title 18 U.S.C. § 2252(a)(1)** **(Penalty: Mandatory minimum 15 to 40 years imprisonment, $250,000 fine, five years to lifetime supervised release, and $5,000 special assessment)** **CYBERSTALKING (Count X)** **Title 18 U.S.C. § 2261A(2)(A) and 2261(b)** **(Penalty: five years imprisonment, $250,000 fine, and three years supervised release)** **INTERCEPTION OF WIRE, ORAL & ELECTRONIC COMMUNICATION (Count XI)** **Title 18 U.S.C. § 2511(1)(a)** **(Penalty: five years imprisonment, $250,000 fine, and three years supervised release)** **USE OF DEVICE TO INTERCEPT ORAL COMMUNICATION (Counts XII & XIII)** **Title 18 U.S.C. § 2511(1)(b)** **(Penalty: five years imprisonment, $250,000 fine, and three years supervised release)** **POSSESSION OF WIRE, ORAL & ELECTRONIC COMMUNICATION INTERCEPTING DEVICE (Count XIV)** **Title 18 U.S.C. § 2512(1)(b)** **(Penalty: five years imprisonment, $250,000 fine, and three years supervised release)** **FORFEITURE ALLEGATION** **Title 18 U.S.C. § 2253(a)**

THE GRAND JURY CHARGES:

COUNT I

That on or about October 2014 through April 2016, in Gallatin County, in the State and District of Montana and elsewhere, the defendant, JAMIE BROCK GRUBB, did employ, use, persuade, induce, entice, and coerce any minor, "Jane Doe," to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce, and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a).

COUNT II

That on or about July 7, 2017, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Snapchat, namely a file ending in B885CB9153BD~VA.jpg, using any means or facility of interstate and foreign commerce and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT III

That on or about July 7, 2017, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Snapchat, namely a file ending in 85F886564273~V4.jpg, using any means or facility of interstate and foreign commerce and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT IV

That on or about February 6, 2016, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Snapchat, namely a file ending in 1FE98A2AD345~V4.jpg, using any means or facility of interstate and foreign commerce and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT V

That on or about August 3, 2015, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Snapchat, namely a file ending in E872B1B239FE~V4.jpg, using any means or facility of interstate and foreign commerce and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT VI

That on or about August 2, 2015, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Snapchat, namely a file ending in D3672B2D76C7~V4.jpg, using any means or facility of interstate and foreign commerce and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT VII

That on or about May 7, 2017, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Anon-IB, namely file 1494151746160.jpg, using any means or facility of interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT VIII

That on or about November 21, 2016, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly distributed a visual depiction on Anon-IB, namely file 1479686690568-1.jpg, using any means or facility of interstate and foreign commerce and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT IX

That between on or about May 26, 2015, and July 2, 2016, in Gallatin County, in the State and District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, knowingly transported any visual depiction using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means including by computer, namely images and a video in his gmail account, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(1) and (b).

COUNT X

That on or about the January 2017 through July 2017, in Gallatin County, in the District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, with the intent to injure, harass and intimidate, and place under surveillance with the intent to injure, harass and intimidate another person, namely Jane Doe, used any electronic communication service and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to Jane Doe, in violation of 18 U.S.C. §§ 2261A(2)(A) and 2261(b).

COUNT XI

That on or about January 10, 2017, through July 19, 2017, in Gallatin County, in the District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, intentionally intercepted and endeavored to intercept any wire, oral and electronic communication, in violation of 18 U.S.C. §§ 2511(1)(a) and (4)(a).

COUNT XII

That on or about January 10, 2017, through July 19, 2017, in Gallatin County, in the District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, intentionally used and endeavored to use any electronic, mechanical, and other device to intercept any oral communication, namely SpyGPSTracker software, when JAMIE BROCK GRUBB knew, and had reason to know, that such device and any component thereof had been sent and transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 2511(1)(b)(iii) and (4)(a).

COUNT XIII

That on or about January 10, 2017, in Gallatin County, in the District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, intentionally used and endeavored to use any electronic, mechanical, and other device, namely Cell Tracker software, to intercept any oral communication when JAMIE BROCK GRUBB knew, and had reason to know, that such device and any component thereof had been sent and transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 2511(1)(b)(iii) and (4)(a).

COUNT XIV

That on or about January 10, 2017, through July 19, 2017, in Gallatin County, in the District of Montana, and elsewhere, the defendant, JAMIE BROCK GRUBB, possessed a device, as defined in 18 U.S.C. § 2510(5), knowing and having reason to know that the design of the device renders it primarily useful for the purpose of the surreptitious interception of wire, oral, and electronic communications, and that such device and any component thereof has been and will be transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 2512(1)(b).

FORFEITURE ALLEGATION

As a result of the commission of the any crime described in counts I through IX above, and upon conviction of any of those crimes, the defendant, JAMIE

BROCK GRUBB, pursuant to 18 U.S.C. § 2253(a), shall forfeit to the United States any property, real and personal, used and intended to be used to commit and to promote the commission of such offenses and any property traceable to such property, including:

- a Samsung Galaxy S7 Edge SM-G935V smartphone, bearing serial number 358166070889644.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

for KURT G. ALME
United States Attorney

for JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons______
Warrant: ✓
Bail: ______